



U.S. Department of Justice

United States Attorney  
Southern District of New York

86 Chambers Street  
New York, New York 10007


March 18, 2020

VIA ECF

Hon. Lewis J. Liman  
United States District Judge  
United States District Court  
500 Pearl Street  
New York, New York 10007

Application for adjournment GRANTED. The Initial Pretrial Conference is reset for May 13, 2020 at 2:30 p.m.

3/18/2020



LEWIS J. LIMAN  
United States District Judge

**Re: *Jabbi, et al. v. Bowes, et al.*, No. 20 Civ. 1561 (LJL)**

Dear Judge Liman:

This Office represents the government in this action in which plaintiffs seek an order compelling U.S. Citizenship and Immigration Services (“USCIS”) to adjudicate a Petition for Alien Relative (Form I-130) and an Application to Register Permanent Residence or Adjust Status (Form I-485). On behalf of the government, I write respectfully to request that the initial conference presently scheduled for April 1, 2020 be adjourned to a date at least one week after May 1, 2020.

By way of background, this Office was served with a copy of the complaint on March 2, 2020. Thus the government’s response to the complaint is due May 1, 2020. *See* Fed. R. Civ. P. 12(a)(2). The adjournment is respectfully requested in light of this May 1 response date, which will allow the government time to investigate the facts and circumstances of the case and formulate its position in this litigation. The government thus respectfully submits that the requested adjournment is in the interests of judicial efficiency and conservation of resources. This is the government’s first request to adjourn the initial conference. Plaintiffs’ counsel consents to this request.

I thank the Court for its consideration of this letter.

Respectfully submitted,

GEOFFREY S. BERMAN  
United States Attorney

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cc: Counsel of record (via ECF)